

EXHIBIT 11

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON) Case No.:
TALCUM POWDER PRODUCTS) 16-2738 (MAS)(RLS)
MARKETING, SALES PRACTICES, AND)
PRODUCTS LIABILITY LITIGATION)
NEWSOME, ET AL.,) Case No.: 3:18-cv-17146
Plaintiffs)
VS.)
JOHNSON & JOHNSON, ET AL.,)
Defendants.)
_____)

DEPOSITION

OF

TERI LONGACRE, M.D.

Monday, June 10, 2024

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Reported By Kathryn Charpentier, CSR 13319

1 using polarized light microscopy to review surgical
2 specimens as a criteria for diagnosing cancer?

3 A. No.

4 Q. And in your experience -- and I think you
5 covered this. I just want to make it clear -- under
6 what circumstances might a surgical pathologist such as
7 yourself use polarized light microscopy when reviewing a
8 case?

9 A. If there's foreign material, refractile
10 material or looking for amyloid and those kinds of
11 things. But there's a specific reason. You just don't
12 do it routinely.

13 Q. In your experience as a pathologist -- I
14 believe you went over this extensively -- can foreign
15 material be introduced into tissue specimens just doing
16 routine hospital processing of slides?

17 A. Yes.

18 Q. How is a pathologist trained to tell the
19 difference between foreign material that's been
20 introduced during histology processing and foreign
21 material that represents an actual true exposure to
22 living tissue prior to surgery?

23 A. Like I said, there should be a foreign body
24 response. There should be some kind of response, or you
25 should see it within macrophages within cells.